Certified Document Number: 74693193 - Page 1 of 2

4/17/2017 9:38:30 AM Chris Daniel - District Clerk Harris County Envelope No. 16478711 By: Bristalyn Daniels Filed: 4/17/2017 9:38:30 AM

#### CAUSE NO. 2017-13051

DANIEL WATROUS,	§	IN THE DISTRICT COURT
RACHEL WATROUS,	§	
	§	
Plaintiffs,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
	§	
ALLSTATE VEHICLE AND PROPERTY	§	
INSURANCE COMPANY	§	
	§	
Defendant.	§	164th JUDICIAL DISTRICT

# DEFENDANT ALLSTATE VEHICLE AND PROPERTY INSURANCE COMPANY'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Allstate Vehicle and Property Insurance Company ("Defendant") and files this Original Answer and would respectfully show the following:

### I. ORIGINAL ANSWER

1. Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendant generally denies each and every, all and singular, the allegations contained within Plaintiffs' Original Petition, and demands strict proof thereon by a preponderance of the credible evidence in accordance with the Constitution and laws of the State of Texas.

## II. PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant Allstate Vehicle and Property Insurance Company prays that upon final trial and hearing hereof, Plaintiffs recover nothing from Defendant, but Defendant goes hence without delay and recovers costs of court and other such further relief, both general and special, to which Defendant may be justly entitled.

/s/ Roger D. Higgins

Roger D. Higgins State Bar No. 09601500 THOMPSON, COE, COUSINS & IRONS, L.L.P. Plaza of the Americas 700 N. Pearl Street, Twenty-Fifth Floor Dallas, Texas 75201-2832

Telephone: (214) 871-8200 Telecopy: (214) 871-8209 rhiggins@thompsoncoe.com

and

Marilyn S. Cayce
State Bar No. 17705500
THOMPSON, COE, COUSINS & IRONS, L.L.P.
One Riverway, Suite 1400
Houston, Texas 77056
Telephone: (713) 403-8216
Telecopy: (713) 403-8299
mcayce@thompsoncoe.com

ATTORNEYS FOR DEFENDANT ALLSTATE TEXAS LLOYD'S

#### CERTIFICATE OF SERVICE

This is to certify that on April 17, 2017 a true and correct copy of the foregoing was delivered to the following counsel for Plaintiff by electronic service:

The Corona Law Firm
Jesse S. Corona
jesse@thecoronalawfirm.com
521 N Sam Houston Pkwy E, Suite 420
Houston, Texas 77060
ATTORNEYS FOR PLAINTIFF

/s/ Marilyn S. Cayce
Marilyn S. Cayce



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this April 20, 2017

Certified Document Number:

74693193 Total Pages: 2

Chris Daniel, DISTRICT CLERK

HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com